

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

STATE OF KANSAS, STATE OF SOUTH
CAROLINA, STATE OF IOWA, STATE OF
ALABAMA, STATE OF ALASKA, STATE OF
ARKANSAS, STATE FLORIDA, STATE OF
GEORGIA, STATE OF IDAHO, STATE OF
INDIANA, COMMONWEALTH OF KENTUCKY,
STATE OF MISSOURI, STATE OF MONTANA,
STATE OF NEBRASKA, STATE OF OKLAHOMA,
STATE OF NORTH DAKOTA, STATE OF SOUTH
DAKOTA, STATE OF UTAH,
COMMONWEALTH OF VIRGINIA, STATE OF
WEST VIRGINIA,
LEADINGAGE KANSAS, LEADINGAGE SOUTH
CAROLINA, LEADINGAGE IOWA,
LEADINGAGE COLORADO, LEADINGAGE
MARYLAND, LEADINGAGE MICHIGAN,
LEADINGAGE MINNESOTA, LEADINGAGE
MISSOURI, LEADINGAGE NEBRASKA,
LEADINGAGE NEW JERSEY/DELAWARE,
LEADINGAGE OHIO,
LEADINGAGE OKLAHOMA, LEADINGAGE PA,
SOUTH DAKOTA ASSOCIATION OF
HEALTHCARE ORGANIZATIONS,
LEADINGAGE SOUTHEAST, LEADINGAGE
TENNESSEE, LEADINGAGE VIRGINIA, DOOLEY
CENTER, WESLEY TOWERS,

Plaintiffs,

v.

XAVIER BECERRA, in his official capacity as
Secretary of the United States Department of
Health and Human Services; UNITED STATES
DEPARTMENT OF HEALTH AND HUMAN
SERVICES; CENTERS FOR MEDICARE &
MEDICAID SERVICES; and CHIQUITA BROOKS-
LASURE, in her official capacity of Administrator
of the Centers for Medicare and Medicaid Services,

Defendants.

Civil Action No. 1:24-cv-00110

MOTION TO FILE AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE
RELIEF

On October 8, 2024, Plaintiffs State of Kansas, *et al.*, filed a Complaint for Declaratory and Injunctive Relief, No. 1:24-cv-00110. Pursuant to Rule 15(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs now move to file the attached Amended Complaint for Declaratory and Injunctive Relief.

Respectfully submitted,

KRIS W. KOBACH
Attorney General of Kansas

BRENNNA BIRD
Attorney General of Iowa

/s/ Abhishek S. Kambli
Abhishek S. Kambli,* Kan. SC No. 29788
Deputy Attorney General
James R. Rodriguez,* Kan. SC No. 29172
Assistant Attorney General
Kansas Office of the Attorney General
Topeka, Kansas 66612-1597
Phone: (785) 296-7109
Email: abhishek.kambli@ag.ks.gov
jay.rodriguez@ag.ks.gov
Counsel for the State of Kansas

/s/ Eric H. Wessan
Eric H. Wessan
Solicitor General
1305 E. Walnut Street
Des Moines, Iowa 50319
Phone: (515) 823-9117
Email: Eric.Wessan@ag.iowa.gov
Counsel for the State of Iowa